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**STATE OF CALIFORNIA**  
**BUSINESS, TRANSPORTATION AND HOUSING AGENCY**  
**DEPARTMENT OF CORPORATIONS**

**TO: Sangyun Kim**  
**Lexis Global Holdings USA, LLC**  
**12112 31st Street #C202**  
**Bellevue, Washington 98005**

**DESIST AND REFRAIN ORDER**  
**(For violation of sections 25110 and 25401 of the Corporations Code)**

The California Corporations Commissioner finds that:

1. At all relevant times, Sangyun Kim was the president of Lexis Global Holdings USA, LLC, a Nevada corporation doing business at 12112 31st Street #C202 Bellevue, Washington 98005. is licensed by the State of California as a licensed insurance agent.

2. Beginning in or about May 2006, Sangyun Kim and Lexis Global Holdings USA, LLC, offered or sold investments in the State of California in the form of investment contracts in Lexis Global Holdings USA, LLC. The investment in Lexis Global Holdings USA, LLC was to be used in “making management consulting and loan application deposit

3. Sangyun Kim and Lexis Global Holdings USA, LLC claimed that investors would double their investment in ten days, and if there was a delay in payment then investors would receive “25% interest per month of the total guaranteed return.” Investors have not received a return or their principal.

1 4. These securities were offered or sold in issuer transactions. The Department of Corporations  
2 has not issued a permit or other form of qualification authorizing any person to offer or sell these  
3 securities in this state.

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5 Based upon the foregoing findings, the California Corporations Commissioner is of the  
6 opinion that the investment contracts in Lexis Global Holdings USA, LLC are securities subject to  
7 qualification under the California Corporate Securities Law of 1968 and have been offered or sold  
8 without being qualified in violation of Corporations Code section 25110. Pursuant to section 25532  
9 of the Corporate Securities Law of 1968, Sangyun Kim and Lexis Global Holdings USA, LLC are  
10 hereby ordered to desist and refrain from the further offer or sale of securities in the State of  
11 California, including but not limited to investment contracts, unless and until qualification has been  
12 made under the law or unless exempt.

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14 Further, the California Corporations Commissioner is of the opinion that the securities  
15 representing investment contracts in Lexis Global Holdings USA, LLC were offered or sold in this  
16 State by means of written or oral communications which included an untrue statement of a material  
17 fact or omitted to state a material fact necessary in order to make the statements made, in the light of  
18 the circumstances under which they were made, not misleading, in violation of section 25401 of the  
19 Corporate Securities Law of 1968. Pursuant to section 25532 of the Corporate Securities Law of  
20 1968, Sangyun Kim and Lexis Global Holdings USA, LLC are hereby ordered to desist and refrain  
21 from offering or selling or buying or offering to buy any security in the State of California, including  
22 but not limited to investment contracts, by means of any written or oral communication which  
23 includes an untrue statement of a material fact or omits to state a material fact necessary in order to  
24 make the statements made, in the light of circumstances under which they were made, not  
25 misleading.

1 The California Corporations Commissioner finds that this Order is necessary or appropriate in  
2 the public interest or for the protection of investors and consistent with the purposes fairly intended  
3 by the policy and provisions of this law.

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5 Dated: April 26, 2007  
6 Sacramento, California

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PRESTON DuFAUCHARD  
California Corporations Commissioner

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By: \_\_\_\_\_

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SHARON A. LUERAS  
Lead Counsel  
Enforcement Division

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